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11 *Attorneys for Plaintiff, U.S. Bank National Association, as Trustee, on Behalf of the Holders of*  
12 *the Asset Backed Securities Corporation Home Equity Loan Trust, Series AEG 2006-HE1 Asset*  
13 *Backed Pass-Through Certificates, Series AEG 2006-HE1*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 U.S. BANK NATIONAL ASSOCIATION, AS  
12 TRUSTEE, ON BEHALF OF THE  
13 HOLDERS OF THE ASSET BACKED  
14 SECURITIES CORPORATION HOME  
15 EQUITY LOAN TRUST, SERIES AEG 2006-  
HE1 ASSET BACKED PASS-THROUGH  
CERTIFICATES, SERIES AEG 2006-HE1,

16 Plaintiff,

17 vs.

18 FIDELITY NATIONAL TITLE GROUP,  
19 INC.; FIDELITY NATIONAL TITLE  
20 INSURANCE COMPANY; FIDELITY  
21 NATIONAL TITLE AGENCY OF NEVADA,  
INC.; DOE INDIVIDUALS I through X; and  
ROE CORPORATIONS XI through XX,  
inclusive,

22 Defendants.  
23

Case No.: 2:21-cv-00388-JAD-EJY

**STIPULATION AND ORDER 1) TO  
RESET BRIEFING ON MOTION TO  
REMAND; AND 2) TO STAY  
DEFENDANTS' DEADLINE TO  
RESPOND TO COMPLAINT AND  
DISCOVERY PENDING RESOLUTION  
OF MOTION TO REMAND**

ECF Nos. 6, 14

24 Plaintiff, U.S. Bank National Association, as Trustee, on Behalf of the Holders of the  
25 Asset Backed Securities Corporation Home Equity Loan Trust, Series AEG 2006-HE1 Asset  
26 Backed Pass-Through Certificates, Series AEG 2006-HE1 ("U.S. Bank") and Defendants  
27 Fidelity National Title Group, Inc., Fidelity National Title Insurance Company and Fidelity  
28 National Title Agency of Nevada, Inc. (collectively, "Defendants", and with U.S. Bank, the

1 “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

- 2 1. On March 8, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District  
3 Court, Case No. A-21-830671-C [ECF No. 1-1];
- 4 2. On March 8, 2021, Fidelity National Title Insurance Company filed a Petition for  
5 Removal to this Court [ECF No. 1];
- 6 3. On April 7, 2021, U.S. Bank filed a Motion for Remand [ECF No. 6];<sup>1</sup>
- 7 4. On April 16, 2021, this Court granted the Parties’ stipulation to stay the case pending  
8 the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir.  
9 Case No. 19-17332 (District Court Case No. 3:19-cv-00241-MMD-WGC) (“*Wells*  
10 *Fargo II*”) [ECF No. 9];
- 11 5. At the time of the stay, Defendants’ time to respond to U.S. Bank’s Complaint and  
12 the Motion for Remand had not yet expired;
- 13 6. According to the terms of the Stipulation to Stay, Defendants’ deadline to oppose the  
14 Motion to Remand and to file a responsive pleading was continued and would be  
15 reset by mutual agreement of the Parties [ECF No. 8];
- 16 7. *Wells Fargo II* resolved via the Ninth Circuit’s mandate on November 29, 2021;
- 17 8. On April 25, 2022, the Court issued an order advising that the Parties must take  
18 action prior to May 25, 2022 [ECF No. 13].

19 **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby  
20 stipulate and agree as follows:

- 21 1. Defendants’ deadline to respond to U.S. Bank’s Motion for Remand [ECF No. 6] is  
22 reset to June 20, 2022.
- 23 2. U.S. Bank hereby withdraws its Motion for Fees and Costs [ECF No. 7].
- 24 3. In the interests of judicial economy, Defendants’ deadline to respond to U.S. Bank’s  
25 Complaint is **STAYED** pending the Motion for Remand.
- 26 4. Discovery in this matter is also **STAYED** pending the Motion for Remand.

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27  
28 <sup>1</sup> Wells Fargo also moved for fees and costs [ECF No. 7]; however, that motion is hereby withdrawn.

- 1           5. Each of the Parties may request a further Fed R. Civ. P. 26(f) conference at any time  
2           180 days after the order granting this Stipulation.
- 3           6. By entering into this Stipulation, none of the Parties is waiving its right to  
4           subsequently move the Court for an order lifting the stay in this action.
- 5           7. In the event the Motion for Remand is denied and this Court retains jurisdiction, the  
6           Parties will submit a proposed discovery plan, as well as a stipulation resetting  
7           Defendants' deadline to respond to the Complaint, within thirty (30) days of the  
8           Court's Order.

9           **IT IS SO STIPULATED.**

10          DATED this 25<sup>th</sup> day of May, 2022.

            DATED this 25<sup>th</sup> day of May, 2022.

11          WRIGHT, FINLAY & ZAK, LLP

            SINCLAIR BRAUN, LLP

12  
13          /s/ Lindsay D. Dragon, Esq.  
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19          Association, as Trustee, on Behalf of the  
20          Holders of the Asset Backed Securities  
21          Corporation Home Equity Loan Trust, Series  
22          AEG 2006-HE1 Asset Backed Pass-Through  
23          Certificates, Series AEG 2006-HE1

/s/ Kevin S. Sinclair  
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            Attorneys for Defendants Fidelity National  
            Title Group, Inc., Fidelity National Title  
            Insurance Company and Fidelity National  
            Title Agency of Nevada, Inc.

24          **IT IS SO ORDERED.**

25          Dated: 5-25-2022  
26          \_\_\_\_\_

27          By:  \_\_\_\_\_  
28          UNITED STATES DISTRICT JUDGE